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Attorneys for Defendant Rene Medina

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RENATO MENDOZA MEDINA,
PHYLLIS REYES CUISON and
RAWLIN CUNDANGAN REYES

Defendants.

Case No. CR-06-144-01 JSW

**STIPULATION AND JOINT REQUEST
TO RESCHEDULE SENTENCING
HEARING**

It is hereby stipulated and agreed between the undersigned parties that, pursuant to Criminal Local Rule 32-2(a), the hearings in the above-titled matter for sentencing defendant Rene Medina and for dismissal of charges against defendants Phyllis Cuison and Rawlin Reyes, which are presently scheduled for June 19, 2008 at 2:30 p.m., shall be continued until October 30, 2008 at 2:30 p.m. The reasons for the continuance are set forth in the accompanying Joint Declaration in Support of

1 Stipulated Request to Reschedule Sentencing Hearing, which has been filed under
2 seal.

3 Counsel for Medina, Cuison, Reyes, and the United States will each be available
4 on October 30, 2008 at 2:30 p.m. Likewise, Ms. Arguedas certifies that her office
5 consulted with the United States Probation Office for the Northern District of California.
6 We are advised that Mr. Medina's probation officer, E. Ann Searles, will be available on
7 October 30, 2008 at 2:30 p.m., as well. Judge White's courtroom deputy advises that
8 the proposed date is also available on the Court's calendar.

9 Wherefore, the parties respectfully request that the sentencing hearing be
10 continued until October 30, 2008 at 2:30 p.m.

11 Dated: _____, 2008

/s/ Cristina C. Arguedas
Cristina C. Arguedas
Arguedas, Cassman & Headley LLP
Attorneys for Rene Medina

13 Dated: _____, 2008

/s/ Cynthia Stier
Cynthia Stier
Assistant United States Attorney
Attorneys for the United States of America

16 Dated: _____, 2008

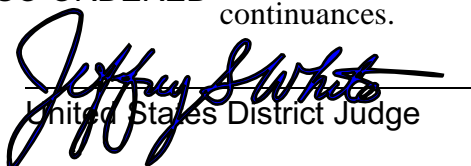
/s/ Ann C. Moorman
Ann C. Moorman
Law Offices of Ann C. Moorman
Attorney for Phyllis Reyes Cuison

18 Dated: _____, 2008

/s/ Lidia Stiglich
Lidia Stiglich
Stiglich & Hinckley LLP
Attorneys for Rawlin Reyes

21 PURSUANT TO STIPULATION, IT IS SO ORDERED There shall be no further
continuances.

22 June 12, 2008
23 Date



United States District Judge